## CITY OF ISSAQUAH MITIGATED DETERMINATION OF NONSIGNIFICANCE (MDNS)

**Description of Proposal:** Proposal for Swedish Property Development Agreement to extend the construction build-out period for the 28.28 acre Swedish Medical Center, from the year 2017 as currently allowed in the Issaquah Highlands Development Agreement (IHDA 1996) to a future build-out year of 2033 (20 years). The Swedish Medical Center would be consistent with the development levels ("project envelope") that were anticipated and approved in the IHDA. The proposed development agreement would only extend the timeframe for the build-out period and would not add development entitlement. Environmental impacts of the Issaquah Highlands have been previously analyzed and addressed in prior environmental documents, which are adopted by reference for the current proposal. This SEPA determination will provide supplemental analysis to evaluate only those impacts that were not previously addressed or where there are potential impacts based on new information.

**Proponent:** Swedish Health Services

**Location of Proposal:** 751 NE Blakely Dr. The site is located in the southeast development area of the Issaquah Highlands, to the south of NE Discovery Drive and west of Highlands drive NE.

**Lead Agency:** City of Issaquah

**Determination:** The lead agency for this proposal has determined that it does not have a probable significant adverse impact on the environment. An environmental impact statement is not required under RCW 43.21C.030(2)(c). This decision was made after review of a completed environmental checklist and other information on file with the lead agency. This information is available to the public on request.

Comment/Appeal Period: This Mitigated Determination of Nonsignificance is issued under WAC 197-11-340(2) and 197-11-680(3)(a)vii, and is based on the proposal being conditioned as indicated below. There is a 21-day combined comment/appeal period for this determination, between October 7, 2013 and October 28, 2013. Anyone wishing to comment may submit written comments to the Responsible Official. The Responsible Official will reconsider the determination based on timely comments. Any person aggrieved by this determination may appeal by filing a Notice of Appeal with the City of Issaquah Permit Center. Appellants should prepare specific factual objections. Copies of the environmental determination and other project application materials are available from the Issaquah Development Services Department, 1775 12th Avenue NW.

**Incorporation by Reference:** The following list of existing studies and documents previously analyzed the environmental impacts of the Issaquah Highlands development. The Swedish Medical Center is an implementing project consistent with the Issaquah Highlands Development Agreement (IHDA 1996) and therefore the previous environmental documentation also addresses the potential impacts of the Swedish Medical Center. The environmental documents listed below are incorporated by reference to provide environmental analysis relevant to the Swedish Medical Center.

These materials are located at the Issaquah Development Service Department, 1775 12<sup>th</sup> Avenue NW, and are available for public review during the SEPA comment/appeal period.

- Grand Ridge Draft and Final Environmental Impact Statement (1995);
- Interstate 90 South Sammamish Plateau Access Road and Sunset Interchange Modifications Draft and Final Environmental Impact Statement (1999), detailing transportation improvements that became the Sunset Interchange with I-90 and Highlands Drive-9th Avenue Couplet;
- Revised Action Memo dated March 23, 2000;

- Addendum, View Analysis of the DNR Expansion Area, PLN00-00141, May 3, 2001
- Final South SPAR Traffic Operations Report (April 2002)
- TRANSPO, Phase 1C Traffic Analysis, February 2002;
- TRANSPO, Issaquah Highlands Town Center Traffic Operations Report Update, October 12, 2007;
- AMEC Earth and Environmental, *Geotechnical Design Report West 45*, November 28, 2007 (the AMEC Report);
- Nelson/Nygaard, Third Draft Memorandum, *Trip Generation Projection for New Development*, October 3, 2008;
- Nelson/Nygaard, First Draft Memorandum, Cost Estimation of Traffic Reduction Measures, October 6, 2008;
- SEP10-001WS WSDOT TDRs Determination of Non-Significance and related records; and,
- TRANSPO, Memorandum, West 45 Buildout Traffic Operations Analysis, March 14, 2013 (the March 2013 TRANSPO Memo).
- TRANSPO Memorandum, West 45 Buildout Trip Generation Comparison & Discovery Drive Assumptions (September 24, 2013)

## **Findings:**

- 1. The overall purpose of the proposed Swedish Property Development Agreement is to extend the construction build-out period. The Issaquah Highlands Development Agreement (IHDA) expires in 2017 and the proposal would allow for a future build-out year of 2033 (20 years). The proposal does not add development entitlement beyond the existing IHDA.
- 2. Environmental impacts of the Issaquah Highlands were analyzed and addressed in prior environmental documents that have been incorporated by reference into this SEPA determination. SEPA Rules allow for the use of previously prepared environmental documents to evaluate proposed actions [WAC 197-11-600(2)]. SEPA review may then focus on issues that were not previously considered, and impacts that may result from substantial changes to a proposal or due to new information indicating significant adverse environmental impacts that were not previously evaluated. The mitigation measures and requirements of the prior environmental documents incorporated by reference will be applied to the Swedish Medical Center proposal as applicable.
- 3. The Swedish Medical Center is consistent with the development anticipated in the Issaquah Highlands and therefore the prior environmental documents prepared for Issaquah Highlands also address the potential environmental impacts of the Swedish Medical Center development.
- 4. The existing Swedish Hospital (538,000 SF) was constructed in 2011. The proposed development agreement would allow an additional 539,000 SF for more medical office and general office buildings and accessory uses, including up to 40,000 SF of accessory retail uses. The proposed additional development is consistent with the level of development or the "project envelope" that was approved in the IHDA; including the allowed land uses, the amount (square footage) of development, and traffic trip generation.
- 5. This SEPA determination addresses only those environmental impacts that were not evaluated in the prior environmental documents, and impacts that are not otherwise mitigated by applicable local,

state and federal laws and regulations. SEPA review is intended to focus on those environmental impacts that cannot be adequately addressed by existing laws and regulations [RCW 43.21C.240(4)]. For example, the project application will be reviewed for compliance with City of Issaquah stormwater code requirements, which have been adopted for the purpose of mitigating stormwater impacts. The Swedish Property Development Agreement also includes specific standards that would mitigate project impacts. For example, the Development Agreement includes design guidelines and standards to mitigate for potential aesthetic and light/glare impacts of the proposal.

6. The traffic trip generation from the Swedish Medical Center would be consistent with the overall capacity and number of allowed trips (6,816 PM peak hour trips) on Highlands Drive, as evaluated in the Interstate 90 South Sammamish Plateau Access Road and Sunset Interchange Modifications Draft and Final Environmental Impact Statement (1999) and the Final South SPAR Traffic Operations Report (April 2002).

A Traffic Operations Analysis (West 45 Buildout Traffic Operations Analysis, Transpo Group, March 14, 2013 and West 45 Buildout Trip Generation Comparison & Discovery Drive Assumption, Transpo Group, September 24, 2013) was prepared to assess potential traffic impacts specific to the Swedish Medical Center, updating the Final South SPAR Traffic Operations Report (April 2002). The analysis included the following notable changes to land use and roadway network assumptions:

- A reduction in the size of the Microsoft campus to the area bound by 9th Avenue, High Street, Discovery Drive;
- More specific and detailed land-use types within the Town Center;
- In addition to general office uses within the West 45 area, land uses also include a hospital and medical office;
- A grid roadway network bound by High Street, 9th Avenue, and Discovery Drive that would allow north-south travel west of 9th Avenue and provide connections to each of the intersections along 9th Avenue for all properties located west of 9th Avenue.

The Traffic Operations Analysis evaluated the proposed Swedish Medical Center and assessed the maximum build-out of the "West 45 area" (south of Discovery Drive and west of Highlands Drive) and of the Swedish property using the updated changes in land use and roadway network assumptions. The analysis determines the number of AM and PM peak hour trips that could be generated from the "West 45 area" and the Swedish property, while still meeting the level of service (LOS) and performance standards used to evaluate traffic operations in the Issaquah Highlands Town Center. The LOS/performance standards include:

- All study intersections would operate at LOS D or better. Thirteen (13) signalized study area intersections were analyzed using Synchro software and the Highway Capacity Manual (TBR, 2000) methodology, consistent with previous analyses;
- Queue lengths would be generally consistent with previous results with one exception, but would not impact operations of the Highlands Drive and 9th Avenue couplet;
- Travel times would meet the thresholds used to identify unacceptable corridor operations

The analysis concluded that the Swedish Medical Center in the "West 45 area" could generate a maximum of 2,448 traffic trips in the PM peak hour while still meeting the level of service and performance standards. In order to maintain traffic level of service (LOS), queuing and travel time standards, development of the Swedish Medical Center shall be limited in traffic trip generation to 2,448 trips in the PM peak hour.

**Mitigation Measures:** The Mitigated Determination of Nonsignificance is based on the checklist received September 26, 2013 and supplemental information in the application. The following SEPA mitigation measures shall be deemed conditions of the approval of the licensing decision pursuant to Chapter 18.10 of the Issaquah Land Use Code. All conditions are based on policies adopted by reference in the Land Use Code.

- Previously prepared environmental documents are incorporated by reference in this SEPA determination. The mitigation measures, requirements and standards of these prior environmental documents shall apply to the Swedish Medical Center to mitigate impacts of future development.
- 2. In order to maintain traffic level of service (LOS), queuing and travel time standards, development of the Swedish Medical Center shall be limited in traffic trip generation to 2,448 trips in the PM peak hour.

**SEPA Responsible Official**: Peter Rosen

**Position/Title:** Senior Environmental Planner

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**Date:** 10/7/2013 **Signature:** \_\_\_\_\_

cc: Washington State Department of Ecology Muckleshoot Indian Tribe U.S. Army Corps of Engineers

Washington State Department of Fish and Wildlife

Eric Laschever, K & L Gates LLC

Issaquah Development Services Department

Issaquah Parks and Public Works Engineering Departments